

EXHIBIT P

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1

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 ORACLE USA, INC., a
4 Colorado corporation;
5 ORACLE AMERICA INC., a
6 Delaware Corporation; and
7 ORACLE INTERNATIONAL
8 CORPORATION, a California
9 Corporation,

10 Plaintiffs,

CASE NO.

2:10-cv-00106-LRH-PAL

11 vs.

12 RIMINI STREET, INC., a
13 Nevada corporation; SETH
14 RAVIN, an individual,

15 Defendants.

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VIDEOTAPED
DEPOSITION OF:

Timothy Brian Conley

DATE:

September 1, 2011

TIME:

9:03 a.m. to 6:29 p.m.

LOCATION:

Westin Hotel
7627 West Courtney
Campbell Causeway
Tampa, FL

TAKEN BY:

Plaintiffs

REPORTER:

Lori L. Bundy,
FPR, RPR, CRR, CLR

Redacted

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1 VIDEOGRAPHER: My name is Scott E. Hay of 09:05:15	1 Howard. I represent Oracle. 09:06:18
2 Veritext. The date today is September 1st, 2011. The 09:05:18	2 Would you please state and spell your last name? 09:06:20
3 time is approximately 9:03. This deposition is being 09:05:23	3 A. Timothy Brian Conley. T-I-M-O-T-H-Y, B-R-I-A-N, 09:06:22
4 held at the Westin Hotel located at 7627 West Courtney 09:05:27	4 C-O-N-L-E-Y. 09:06:28
5 Campbell Causeway. 09:05:36	5 Q. Where are you currently employed? 09:06:29
6 The caption of this case is Oracle USA, 09:05:36	6 A. Rimini Street, Incorporated. 09:06:31
7 Incorporated, et al. versus Rimini Street, 09:05:38	7 Q. For how long have you been employed there? 09:06:32
8 Incorporated, et al., in the United States District 09:05:43	8 A. About -- let's see. Almost three years. 09:06:34
9 Court, District of Nevada. The name of the witness is 09:05:45	9 Two years and 10 months, I believe. 09:06:43
10 Tim Conley. 09:05:47	10 Q. When did you start? 09:06:45
11 At this time, the attorneys will identify 09:05:48	11 A. It was the end of October, 2008. 09:06:46
12 themselves and the parties they represent, after which 09:05:50	12 Q. Have you ever worked for Oracle? 09:06:52
13 our court reporter, Lori Bundy, of Veritext, will 09:05:52	13 A. No. 09:06:56
14 swear in the witness and we can proceed. 09:05:55	14 Q. Have you ever worked for PeopleSoft? 09:06:57
15 MR. HOWARD: Geoff Howard with Bingham McCutchen 09:05:57	15 A. No. 09:06:59
16 for Plaintiff Oracle. 09:06:00	16 Q. Have you been worked for TomorrowNow? 09:07:01
17 MR. RECKERS: Rob Reckers, Shook, Hardy & Bacon 09:06:01	17 A. No. 09:07:04
18 for the Defendants, Rimini. 09:06:12	18 Q. Prior to joining Rimini, had you worked for any 09:07:04
19 THEREUPON, 09:06:12	19 third-party support provider that is now owned by Oracle? 09:07:08
20 TIMOTHY BRIAN CONLEY, 09:06:12	20 A. No, sir. 09:07:12
21 a witness, having been first duly sworn, upon his oath, 09:06:12	21 Q. What's your educational background after high 09:07:12
22 testified as follows: 09:06:15	22 school? 09:07:14
23 DIRECT EXAMINATION 09:06:15	23 A. None. High school diploma. 09:07:14
24 BY MR. HOWARD: 09:06:15	24 Q. Have you had technical classes or training in 09:07:17
25 Q. Good morning, Mr. Conley. My name is Geoff 09:06:16	25 software? 09:07:20
6	7
1 A. PeopleSoft technical classes, yes. 09:07:21	1 business analyst and as a user. 09:08:50
2 Q. Could you describe those? 09:07:24	2 Q. And that was from 1998 until when? 09:08:56
3 A. I've had PeopleTools 1 and 2, Application Engine, 09:07:25	3 A. That would have been '99 to 2000. 09:08:58
4 PeopleCode, SQR. I think that summarizes pretty much 09:07:33	4 Q. What was your next job after that involving 09:09:01
5 those. 09:07:39	5 PeopleSoft software? 09:09:04
6 Q. And from whom did you take those classes? 09:07:40	6 A. Right. PriceWaterhouseCoopers from 2000 until 09:09:05
7 A. They were on-the-job training, jobs I was working 09:07:42	7 2003 -- no, 2004. 09:09:11
8 on. 09:07:44	8 Q. And what were your responsibilities there? 09:09:13
9 Q. Who was your employer at the time? 09:07:45	9 A. Software developer. 09:09:15
10 A. One was Crowley Maritime Corporation. The other 09:07:47	10 Q. What kind of software were you developing? 09:09:20
11 was PriceWaterhouseCoopers. I think that's it. 09:07:51	11 A. PeopleSoft. 09:09:22
12 Q. And when you say on-the-job training, were those 09:07:56	12 Q. What were the nature of the projects you were 09:09:22
13 formal classes organized and provided by the employer? 09:07:58	13 working on for PWC? 09:09:25
14 A. For PriceWaterhouseCoopers, yes. Crowley 09:08:01	14 A. Customizations to SQRs, app engines, pages, 09:09:27
15 Maritime was at a PeopleSoft location in Atlanta, training 09:08:08	15 interfaces between payroll and third-party payroll 09:09:37
16 class. 09:08:11	16 vendors. 09:09:42
17 Q. What's your work background dating back to, let's 09:08:11	17 Q. Was this acting as a consultant for existing 09:09:42
18 say, your first job involving any kind of PeopleSoft 09:08:26	18 clients of PWC? 09:09:45
19 software or Oracle software? 09:08:30	19 A. No, it was for their internal firm services. 09:09:47
20 A. My first job was for CSX, the transportation, 09:08:32	20 Q. So PWC's own instance of the PeopleSoft software? 09:09:50
21 railroad, as a payroll analyst; just using it as a user. 09:08:36	21 A. Correct. 09:09:55
22 Q. And when was that? 09:08:42	22 Q. And what applications were you working on? 09:09:55
23 A. It was 1998. 09:08:43	23 A. HRMS payroll benefits and HR. 09:09:58
24 Q. And what was your next job after that? 09:08:45	24 Q. All right. After PWC, where did you go? 09:10:04
25 A. I worked for Crowley Maritime Corporation as a 09:08:47	25 A. I went into consulting, independent. 09:10:08
8	9

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1	Q. Just set up your own shop?	09:10:12	1	A. No, sir.	09:11:28
2	A. Yeah.	09:10:13	2	Q. So if you were working remotely, how would you	09:11:29
3	Q. And how did you get work?	09:10:14	3	do -- how would you perform your work for Boeing or for	09:11:31
4	A. Monster.com mostly. Put my resumé out. People	09:10:16	4	one of the other --	09:11:34
5	called me.	09:10:21	5	A. Remote desktop connection.	09:11:35
6	Q. What kind of jobs did you get? What were some	09:10:22	6	Q. You would dial into their machine?	09:11:37
7	examples?	09:10:24	7	A. Correct.	09:11:39
8	A. I worked for Boeing, Florida State University,	09:10:25	8	Q. And so you would be doing development work in	09:11:39
9	Siemens, Royal Bank of Scotland, Extensure (phonetic),	09:10:30	9	some of those projects?	09:11:44
10	Unilever.	09:10:34	10	A. Yes, sir.	09:11:45
11	Q. And in each of those instances, were you also	09:10:35	11	Q. And so you would do your work by dialing in	09:11:46
12	doing development work with PeopleSoft software?	09:10:39	12	remotely --	09:11:49
13	A. Yes.	09:10:41	13	A. Yes.	09:11:50
14	Q. Let's take Boeing, for example. When you signed	09:10:42	14	Q. -- through a VPM connection?	09:11:50
15	up as a contractor with Boeing through your consultancy,	09:10:51	15	A. Yes.	09:11:52
16	what was the nature of the project?	09:10:56	16	Q. Did you ever download or have objects that you	09:11:53
17	A. It was actually in financials and it was	09:10:57	17	were working on on your local machine as a consultant	09:11:56
18	consolidation of their general book of ledger, so --	09:11:03	18	working for any of these clients?	09:12:00
19	Q. Would you be working remotely or would you be	09:11:08	19	A. Not to my recollection.	09:12:01
20	working onsite at each of these clients when you were	09:11:11	20	Q. When did you stop working as an independent	09:12:03
21	consulting?	09:11:14	21	consultant?	09:12:14
22	A. It was a mixture.	09:11:15	22	A. When I started working for Rimini Street, 2008.	09:12:15
23	Q. Did you ever have a local version of PeopleSoft	09:11:16	23	Around October 2008.	09:12:19
24	software on your home machine as part of your work as a	09:11:23	24	Q. Have you done any consulting on the side while	09:12:20
25	consultant with any of these companies?	09:11:26	25	you've been working for Rimini Street?	09:12:24
	10			11	
1	A. No, sir.	09:12:27	1	A. No, sir.	09:13:14
2	Q. Have you ever had your deposition taken before?	09:12:28	2	(A discussion was held off the record.)	09:13:29
3	A. No, I haven't.	09:12:29	3	BY MR. HOWARD:	09:13:31
4	Q. I'm going to go over a couple of the rules. You	09:12:30	4	Q. If you don't understand a question, will you tell	09:13:34
5	may have gone over with them with your attorney, but let	09:12:33	5	me and I'll do my best to rephrase it?	09:13:36
6	me go over just a couple of the ones that I hope we'll	09:12:35	6	A. Yes, sir.	09:13:38
7	follow today.	09:12:37	7	Q. And it's important that we speak one at a time.	09:13:38
8	You understand that the oath you took is an oath	09:12:37	8	Already a couple of times you've started to answer a	09:13:42
9	to tell the truth, the same as if you were in a court of	09:12:41	9	question when I wasn't done. And I'll do my best not to	09:13:45
10	law?	09:12:43	10	step over you. But that way the court reporter can take	09:13:48
11	A. Yes.	09:12:43	11	down a complete question and a complete answer.	09:13:50
12	Q. You understand that the court reporter is going	09:12:43	12	Is that fair?	09:13:53
13	to take down what we say -- my questions and your	09:12:45	13	A. Yes, sir.	09:13:53
14	answers -- and prepare a written transcript?	09:12:47	14		
15	A. Yes.	09:12:49	15		
16	Q. You understand that you'll have an opportunity to	09:12:50	16		
17	change your testimony when you get that written	09:12:52	17		
18	transcript, but that if you do, me or somebody else at a	09:12:57	18		
19	later proceeding will be able to comment on that?	09:12:59	19		
20	A. Yes.	09:13:02	20		
21	Q. So you understand it's important to give your	09:13:03	21		
22	best testimony to the best of your ability here today?	09:13:05	22		
23	A. Yes.	09:13:07	23		
24	Q. Is there any reason why you can't give your best	09:13:07	24		
25	testimony? Medication or some other reason?	09:13:12	25		
	12				13

Redacted

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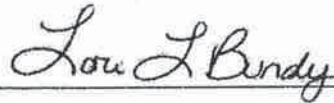
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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF COLLIER)

I, the undersigned authority, certify that
TIMOTHY BRIAN CONLEY personally appeared before me and was
duly sworn.

WITNESS my hand and official seal this _____
day of _____, 2011.



Lori L. Bundy

Notary Public - State of Florida

My Commission No.: DD 713641

Expires: September 11, 2011

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REPORTER'S DEPOSITION CERTIFICATE

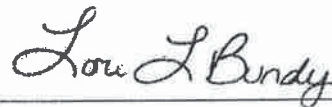
STATE OF FLORIDA)

COUNTY OF COLLIER)

I, Lori L. Bundy, Certified Court Reporter and Notary Public in and for the State of Florida at Large, certify that I was authorized to and did stenographically report the deposition of TIMOTHY BRIAN CONLEY; that a review of the transcript was not requested and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties; nor am I a relative or employee of any of the parties' attorney or counsel connected with the action; nor am I financially interested in the action.

DATED this _____ day of _____, 2011.



Lori L. Bundy, FPR, RPR, CRR, CLR